



Re: question on WER for UTRWD (TPDES 14323-001) 
Diane Evans to: Michael Pfeil

05/05/2010 04:07 PM

Thanks Mike. As we discussed, I'll include a dissolved WER value of 6.43 in EPA's "approvable" letter. This is a corrected value from the calculations on page 8 of Study Report for Round #2 and the values included in the Summary Table of the submittal letter from Alan Plummer (dated November 5, 2009).

You do not need to send a revised letter from TCEQ.

"Michael Pfeil"

Diane-

05/05/2010 02:28:17 PM

From: "Michael Pfeil" <MPFEIL@tceq.state.tx.us>
To: Diane Evans/R6/USEPA/US@EPA
Cc: Matt Hubner/R6/USEPA/US@EPA
Date: 05/05/2010 02:28 PM
Subject: Re: question on WER for UTRWD (TPDES 14323-001)

Diane-

I see what happened now.

The top values on page 8 were those described as using the values derived by using the normalized SMAV, but since the lab water values were greater, those were used for the actual WER, BUT THEY ARE NOT! They are the LW values (see top of page 7). The idea is to use the larger value in order to get the *smaller* WER, correct? So those are the values that should have been used (6.56 and 7.82), not 6.66 and 7.94.

In their final report letter, they have values for study 2 from both the SMAV (6.66) and the LW (7.82). *correct for total*

6.42 I would advocate that the FWER values should be *5.73* 5.69 for total (geometric mean of 4.93 and 6.56) and 6.38 for dissolved (geometric mean of 5.20 and 7.82). (My memo to the permit writer does contain the dissolved value of 6.38, as does the letter to you.) *7.942*

Does that make sense? If it does not, please correct me, because I am obviously confused (and the transposed values in study 2 did not help!).

Mike

>>> On 5/3/2010 at 4:29 PM, <Evans.Diane@epa@mail.epa.gov> wrote:

Hi Mike,

Matt reviewed the copper WER for this facility. The TPDES permit does not expire until July 2011, so it will likely be a while before we see the public participation documentation. Everything looks pretty good, but Matt found calculation errors in round #2 which also affects the calculation of the final WER.

On page 8 of the September 2009 report, we believe that incorrect values are recorded for the

calculation of round 2 WERs (August 2009). We calculate a total recoverable copper WER of 6.6632 (rather than 6.5614) and a dissolved copper WER of 7.9421 (rather than 7.819). The correct values are recorded in the Conclusions section (further down on page 8).

I think in the calculation of the final WER (identified in the cover letter), you used the values at the top of page 8 for round 2. For a dissolved copper final WER, we calculated 6.4252 as a geometric mean of 5.1981 (round 1) and 7.9421(round 2). For a total copper final WER (less likely to be used), we calculate 5.7342.

When you have a chance to review, please me know what you think and then we can finalize the "approvable" letter.

Thanks,

Diane